

D. Michael Lynn
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John Y. Bonds, III
State Bar I.D. No. 02589100
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ATTORNEYS FOR JAMES DONDERO

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

IN RE:

**HIGHLAND CAPITAL MANAGEMENT,
L.P.,**

Debtor.

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Case No. 19-34054

Chapter 11

NOTICE OF DEPOSITION

PLEASE TAKE NOTICE that James Dondero (“Dondero”), by and through his undersigned counsel, hereby gives notice pursuant to Rule 30 of the Federal Rules of Civil Procedure (the “Federal Rules”) and Rules 7030 and 9014 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) he will take the oral deposition of Mr. James P. Seery, Jr., Chief Executive Officer and Chief Restructuring Officer of debtor Highland Capital Management, L.P. (the “Debtor”). The deposition will be conducted virtually through Zoom commencing on **Monday, December 14, 2020 at 9:30 a.m.** (Central Time).

PLEASE TAKE FURTHER NOTICE that said deposition of Mr. Seery will be taken before a Notary Public or other person authorized to administer oaths pursuant to Federal Rule 28(a), applicable pursuant to Bankruptcy Rule 7028. The testimony at the deposition may be

recorded by videographic and/or stenographic means. You are invited to participate to the extent permitted by the Federal Rules and the Bankruptcy Rules. Any party who plans to attend must contact undersigned counsel and counsel for the Debtor at least 24 hours in advance of the deposition and identify the person(s) who will be attending.

NOTICE IS FURTHER GIVEN that, pursuant to the Supreme Court of Texas's Emergency Orders Regarding the COVID-19 State of Disaster and the applicable city, county, and state Emergency Declarations, as well as the Standing Orders and Notices issued by the United States District Court for the Northern District of Texas and the United States Bankruptcy Court for the Northern District of Texas, the deposition shall be conducted utilizing Zoom, a secure web-based platform to provide remote access for those parties attending the deposition or wishing to participate in the deposition via the internet and/or telephone. Accordingly, the court reporter may be remote for the purposes of reporting the proceeding and may not be in the presence of the deponent. Necessary credentials, call-in numbers, and testing information has been provided to you, or will be provided to you, by email, or shall be arranged as agreed to by the parties. In addition, Dondero also reserves the right to utilize instant visual display technology such that the court reporter's writing of the proceeding will be displayed simultaneous to their writing of same on one's laptop, iPad, tablet, or other type of display device connected to the court reporter.

This Notice will remain in effect until the deposition is fully completed. You are invited to attend and examine as you see fit.

Dated: December 11, 2020

Respectfully submitted,

/s/ Bryan C. Assink

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CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that, on December 11, 2020, a true and correct copy of the foregoing document was served via the Court's CM/ECF system and direct email on counsel for the Debtor and via the Court's CM/ECF system on all other parties requesting or consenting to such service in this case.

/s/ Bryan C. Assink

Bryan C. Assink